

UNITED STATES BANKRUPTCY COURT	)	
SOUTHERN DISTRICT OF NEW YORK	)	
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	)	
_____	)	CASE NO. 18-23538-RDD
IN RE:	)	
	)	CHAPTER 11
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	)	
	)	
Debtors.	)	
	)	

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**LIMITED OBJECTION AND JOINDER BY SERTA SIMMONS  
 BEDDING, LLC, SERTA, INC., SIMMONS BEDDING COMPANY, LLC  
 AND SSB MANUFACTURING COMPANY TO CROSS COUNTRY  
 HOME SERVICES, INC'S OBJECTION TO DEBTORS' MOTION FOR  
 AUTHORITY TO (A) OBTAIN POSTPETITION FINANCING, (B) USE  
 CASH COLLATERAL, (C) GRANT CERTAIN PROTECTIONS TO  
 PREPETITION SECURED PARTIES, AND (D) SCHEDULE SECOND  
INTERIM HEARING AND FINAL HEARING**

Serta Simmons Bedding, LLC, Serta, Inc., Simmons Bedding Company, LLC and SSB Manufacturing Company (collectively, "Simmons") hereby submits this Objection ("the Objection") to the *Debtors' Motion for Authority to (A) Obtain Postpetition Financing, (B) Use Cash Collateral, (C) Grant Certain Protections to Prepetition Secured Parties, and (D) Schedule Second Interim Hearing and Final Hearing* (Doc. No. 7) (the "Motion"). In support of the Objection, Simmons respectfully states as follows:

1. Simmons is a creditor of Debtors due to certain goods that Debtors received from Simmons in the ordinary course of business for which Simmons has not received payment.
2. Simmons has filed a Notice of Filing Reclamation Demand of Serta Simmons Bedding, LLC, Serta, Inc., Simmons Bedding Company, LLC and SSB Manufacturing Company [Doc.

No. 411] on November 1, 2018.

3. Simmons hereby joins the Limited Objection of Cross Country Home Services, Inc. [Doc. No. 532] (“Cross Country Objection”) to the Motion.

4. Simmons reserves their rights to amend and/or supplement this Objection and to raise any additional objections to the Motion at the hearing to consider the Motion.

**WHEREFORE**, Simmons requests that the Court (i) deny the Motion unless the final order granting the Motion is modified as requested herein and in the Cross Country Objection; and (ii) granting such other and further relief as this Court deems just and proper.

This 14th day of November, 2018.

**ROGERS LAW OFFICES**

By: /s/Beth E. Rogers  
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*Attorney for Simmons*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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CASE NO. 18-23538-RDD

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IN RE:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.

**CERTIFICATE OF SERVICE**

This is to certify that I have this date served the following as counsel of record in the foregoing matter, with a copy of the within and foregoing **LIMITED OBJECTION AND JOINDER BY SERTA SIMMONS BEDDING, LLC, SERTA, INC., SIMMONS BEDDING COMPANY, LLC AND SSB MANUFACTURING COMPANY TO CROSS COUNTRY HOME SERVICES, INC'S OBJECTION TO DEBTORS' MOTION FOR AUTHORITY TO (A) OBTAIN POSTPETITION FINANCING, (B) USE CASH COLLATERAL, (C) GRANT CERTAIN PROTECTIONS TO PREPETITION SECURED PARTIES, AND (D) SCHEDULE SECOND INTERIM HEARING AND FINAL HEARING** by filing with the Clerk of Court using the CM/ECF system which will automatically send an email notification of such filing to

the following:

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Dated: November 14, 2018.

/s/ Beth E. Rogers  
Beth E. Rogers  
Georgia Bar No. 612092  
*Attorney for Simmons*